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*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	: Chapter 11
	:
PURDUE PHARMA L.P., <i>et al.</i> ,	: Case No. 19-23649 (RDD)
	:
Debtors <sup>1</sup> .	: (Jointly Administered)
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**TWENTY SECOND MONTHLY FEE STATEMENT OF OTTERBOURG P.C. FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL OF THE AD HOC  
COMMITTEE'S PROFESSIONALS FOR THE PERIOD OF  
JULY 1, 2021 THROUGH AND INCLUDING JULY 31, 2021**

Name of Applicant:	Otterbourg P.C.
Applicant's Role in Case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019, [dkt. no. 553]

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Period for Which Compensation is Sought:	July 1, 2021 – July 31, 2021
Total Amount of Fees Incurred:	\$170,081.00
Total Fees Requested (80%):	\$136,064.80
Total Reimbursement of Expenses Incurred:	\$12.00
Total Reimbursement of Expenses Requested (100%):	\$12.00
Total compensation and Reimbursement Requested in this Statement:	\$136,076.80
This is Applicant's:	Twenty Second Monthly Fee Statement

Pursuant to the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals*, dated December 2, 2019 [Dkt. No. 553] (the "Fee Assumption Order"), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 [Dkt. No. 529] (the "Interim Compensation Order"), Otterbourg P.C. (the "Applicant"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in the above-captioned case, hereby submits this Twenty Second Monthly Fee Statement (the "Fee Statement") for the period of July 1, 2021 – July 31, 2021 (the "Statement Period").

#### **Itemization of Services Rendered and Disbursements Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period with respect to each of the project categories. As reflected in Exhibit A, Applicant incurred \$170,081.00 in fees during the Statement Period. Pursuant to this Fee Statement, Applicant seeks reimbursement for 80% of such fees, totaling \$136,064.80.

2. Annexed hereto as **Exhibit B** is a chart of Applicant's professionals and paraprofessionals, including the standard hourly rate for each attorney and paraprofessional who rendered services to the Debtors in connection with these chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Statement Period is \$1,175.36<sup>2</sup>. The Blended hourly rate of all paraprofessionals is \$325.00<sup>3</sup>. A copy of the computer-generated time entries reflecting the time recorded, organized in project billing categories by Applicant is attached hereto as **Exhibit C**.

3. Annexed hereto as **Exhibit D** is a chart of necessary and out-of-pocket expenses incurred by the Applicant in the amount of \$12.00 in connection with providing professional services during the Statement Period. A copy of the computer-generated list of expenses is attached hereto as **Exhibit E**.

4. Applicant, to the best of its knowledge, has not included any fees in connection with or relating to the allocation of value among the Debtors' creditors.

### **Notice**

5. Applicant will provide notice of this Fee Statement in accordance with the Interim Compensation Order.

WHEREFORE, Applicant, in connection with services rendered as co-counsel to the ad hoc committee of governmental and other contingent litigation claimants, respectfully requests (i) compensation in the amount of \$136,064.80, which is equal to 80% of the total amount of reasonable compensation for actual, necessary legal services that Applicant incurred in

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<sup>2</sup> The blended hourly billing rate of \$1,175.36 is derived by dividing the total fees for attorneys of \$167,253.50 by the total hours of 142.3.

<sup>3</sup> The Blended hourly billing rate of \$325.00 for paraprofessionals is similarly derived by dividing the total fees for paraprofessionals of \$2,827.50 by the total hours of 8.7.

connection with such services during the Statement Period (*i.e.*, \$170,081.00) and (ii) payment of \$12.00 for the actual, necessary expenses that Applicant incurred in connection with such services during the Statement Period.

Dated: September 10, 2021  
New York, New York

OTTERBOURG P.C.

By: /s/ Melanie L. Cyganowski  
Melanie L. Cyganowski, Esq.  
Jennifer S. Feeney, Esq.  
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New York, New York 10169  
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Litigation Claimants*

**EXHIBIT A**

**Fees By Project Category**

**SUMMARY OF COMPENSATION BY PROJECT CODE  
FOR THE STATEMENT PERIOD**

<b>Project Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
PU04	Case Administration	5.3	\$6,359.50
PU06	Employment and Fee Applications	26.2	\$18,995.00
PU08	Litigation: Contested Matters, Adversary	.9	\$1,260.00
PU09	Meetings and Communications w/ AHC	13.0	\$15,725.50
PU11	Plan & Disclosure Statement	105.6	\$127,741.00
	<b>TOTALS:</b>	<b>151.0</b>	<b>\$170,081.00</b>

**EXHIBIT B**

**Professional and Paraprofessional Fees**

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS  
FOR THE STATEMENT PERIOD**

<b>Professional</b>	<b>Year Admitted</b>	<b>Rate Per Hour</b>	<b>No. of Hrs.</b>	<b>Total Compensation</b>
Melanie L. Cyganowski ("MLC") Partner	1982	\$1400.00	79.0	\$110,600.00
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$895.00	63.3	\$56,653.50
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$325.00	8.7	\$2,827.50
	<b>TOTAL</b>		<b>151.0</b>	<b>\$170,081.00</b>



**EXHIBIT C**

**Time Detail**

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter No.: 20186/0002  
Matter Name: CHAPTER 11  
Billing Partner: RL STEHL

August 13, 2021  
BILL NO. 218470

For Services Rendered Through July 31, 2021:

Phase: PU04		CASE ADMINISTRATION	
DATE ATTORNEY	DESCRIPTION	HOURS	AMOUNT
07/09/21 MLC	Correspondence Correspondence with consenting states re various monitor issues	.60	840.00
07/20/21 MLC	Analysis of Memorandum Review and analysis of Examiner report	1.30	1,820.00
07/21/21 JSF	Examine Documents Review of KEIP/KERP Counterproposals	.30	268.50
07/27/21 JSF	Examine Documents Review of NCSG Objection to KEIP/KERP	.30	268.50
07/29/21 JSF	Telephone Call(s) Participate in Court Hearing re: KERP	1.50	1,342.50
07/29/21 MLC	Court Appearance - General Hearing on 2021 KERP	1.30	1,820.00
TOTAL PHASE PU04		5.30	\$6,359.50

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Phase: PU06

EMPLOYMENT & FEE APPLICATIONS

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/21 JSF	Prepare Legal Papers Preparation of January Monthly Fee Statement	1.20	1,074.00
07/01/21 JSF	Examine Documents Review of January and February Time Detail	.80	716.00
07/02/21 JSF	Prepare Legal Papers Preparation of Fee Application	2.20	1,969.00
07/02/21 JSF	Examine Documents Preparation of January and February Fee Statements	.60	537.00
07/02/21 JKH	Prepare Papers Prepare draft monthly statements	.60	195.00
07/06/21 JSF	Examine Documents Review of January and February Fee Statements	.70	626.50
07/06/21 JKH	Prepare Papers Prepare draft statements for January and February	1.20	390.00
07/09/21 JSF	Prepare Legal Papers Preparation of Interim Fee Application	1.50	1,342.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/09/21 JKH	Prepare Papers Prepare draft monthly statements	.70	227.50
07/12/21 JSF	Prepare Legal Papers Preparation of Fifth Interim Application	1.60	1,432.00
07/12/21 JKH	Prepare Chart(s) Prepare exhibits for interim fee application	.90	292.50
07/13/21 JSF	Examine Documents Preparation of March Monthly Fee Statement	.90	805.50
07/13/21 JSF	Prepare Legal Papers Preparation of Interim Fee Application	1.80	1,611.00
07/14/21 JSF	Examine Documents Review of March, April and May Monthly Fee Statements	2.30	2,058.50
07/14/21 JSF	Prepare Legal Papers Preparation of Interim Fee Application	1.70	1,521.50
07/14/21 MLC	Examine Documents Final review of fee application and underlying fee statements	1.00	1,400.00
07/14/21 JKH	Prepare Papers Prepare final monthly statements for March through May	1.30	422.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/14/21 JKH	Prepare Papers Prepare and finalize exhibits for fee application	3.40	1,105.00
07/15/21 JSF	Examine Documents Review of Finalized Interim Fee Application for Filing	1.20	1,074.00
07/15/21 JKH	Prepare Papers Edit fee application and prepare for filing	.30	97.50
07/30/21 JKH	Correspondence Prepare draft email requesting payment for monthly statements	.30	97.50
TOTAL PHASE PU06		26.20	\$18,995.00

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Phase: PU08	LITIGATION: CONTESTED MATTERS, ADVERSARY
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/14/21 MLC	Analysis of Memorandum Review of DOJ proposed changes to draft injunction	.90	1,260.00
TOTAL PHASE PU08		.90	\$1,260.00

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Phase: PU09	MEETINGS & COMMUNICATIONS W/ AD HOC
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/21 JSF	Telephone Call(s) Participate in Status Call with Professionals and Certain State AHC Members	.50	447.50
07/02/21 MLC	Conference call(s) Conference call with certain States and lit team re WVA objection and next steps	.50	700.00
07/06/21 MLC	Conference call(s) Meeting with mediation subcommittee re status of mediation and related issues	.70	980.00
07/07/21 JSF	Telephone Call(s) Participate in Weekly AHC Meeting	.80	716.00
07/07/21 MLC	Conference call(s) Weekly meeting of AHC	1.00	1,400.00
07/08/21 MLC	Conference call(s) Conference call with mediation subcommittee of AHC to discuss mediation proposal agreement with additional states and next steps	.80	1,120.00
07/13/21 MLC	Examine Documents Review of case update provided by KL to AHC	1.10	1,540.00
07/14/21 JSF	Telephone Call(s) Participate in Weekly AHC Call	1.60	1,432.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/14/21 MLC	Prepare for Meeting Reviewed agenda in preparation for weekly meeting with AHC	.30	420.00
07/14/21 MLC	Conference call(s) Weekly meeting with AHC and counsel	1.60	2,240.00
07/21/21 JSF	Telephone Call(s) Participate in Weekly Meeting of AHC	1.00	895.00
07/21/21 MLC	Conference call(s) Participate in Weekly AHC meeting	1.10	1,540.00
07/28/21 JSF	Telephone Call(s) Participate in Weekly Meeting of AHC	1.00	895.00
07/28/21 MLC	Conference call(s) Weekly meeting with AHC and counsel	1.00	1,400.00
TOTAL PHASE PU09		13.00	\$15,725.50

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Phase: PU11	PLAN & DISCLOSURE STATEMENT
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/21 MLC	Analysis of Memorandum Review and analysis of 7th Plan Supplement filed by Debtors re PI Trust Agreement, PI Futures Trust Agreement and PI Futures Trust TDP	2.20	3,080.00
07/01/21 MLC	Analysis of Memorandum Review and analysis of report from West Virginia experts Malone and Cowan	1.10	1,540.00
07/01/21 MLC	Examine Documents Examined documents designated as confidential by West Virginia concerning state allocation methodology	1.70	2,380.00
07/01/21 MLC	Correspondence Correspondence with States' representatives re WVA claims process	.70	980.00
07/02/21 MLC	Conference call(s) Conference call to discuss response to WVA motion re allocation	.60	840.00
07/06/21 JSF	Examine Documents Review Revised Draft of NewCo Operating Agreement	1.20	1,074.00
07/06/21 MLC	Analysis of Memorandum Review and analysis off confidential mediation proposal	1.60	2,240.00



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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/06/21 MLC	Analysis of Memorandum Review of proposed changes to NOAT agreement	1.30	1,820.00
07/06/21 MLC	Analysis of Memorandum Review of document repository agreement as proposed in mediation	.90	1,260.00
07/06/21 MLC	Analysis of Memorandum Review of AHC comments to NewCo Transfer Agreement	1.10	1,540.00
07/07/21 JSF	Examine Documents Review of Certain Plan Supplement Documents	.80	716.00
07/07/21 JSF	Examine Documents Review of NewCo Operating Agreement Draft and Comments	.60	537.00
07/07/21 JSF	Examine Documents Review of Update Summary of Open Issues re: Sackler Settlement Agreement	.70	626.50
07/07/21 MLC	Analysis of Memorandum Review of debtors' modifications to MDT Agreement	1.50	2,100.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/07/21 MLC	Correspondence Review of correspondence between Kramer Levin and AHC mediation subcommittee re proposed changes to mediation proposal with former NCSG	.50	700.00
07/07/21 MLC	Analysis of Memorandum Review and analysis of mark-ups of the NewCo Agreement by DOJ	1.30	1,820.00
07/07/21 MLC	Analysis of Memorandum Review of the comments made by TN AG to the NewCo/TopCo Operating Agreements and the responses by Brown Rudnick to those comments	2.20	3,080.00
07/08/21 JSF	Telephone Call(s) Review of Updates on Status of Plan and Supplemental Documents	1.20	1,074.00
07/08/21 MLC	Correspondence Correspondence re Dr Cowan's deposition testimony	.80	1,120.00
07/08/21 MLC	Analysis of Memorandum Reviewed mediation memorandum	1.10	1,540.00
07/08/21 MLC	Correspondence Correspondence with John Guard re revisions to his declaration in support of certain plan supplements	.60	840.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/08/21 MLC	Examine Documents Review of the Mediator's Report	.60	840.00
07/08/21 MLC	Examine Documents Examined correspondence re revisions to proposed Sackler agreement with States	.50	700.00
07/08/21 MLC	Correspondence Correspondence with John Guard in connection with his draft declaration in support of confirmation	.40	560.00
07/08/21 MLC	Examine Documents Review of summary of Dr Cowan's deposition testimony	.80	1,120.00
07/09/21 MLC	Analysis of Memorandum Review of certain plan provisions re interaction between various trusts	1.10	1,540.00
07/11/21 MLC	Analysis of Memorandum Review of changes to 6th Amended Plan	2.20	3,080.00
07/11/21 MLC	Correspondence Correspondence between KL/AHC and debtors' re certain corresponding changes to 6th amended plan concerning NewCo	.80	1,120.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/11/21 MLC	Examine Documents Review of proposed changes to certain trusts and NewCo operating agreements required to be included in POR as amended by debtors	1.30	1,820.00
07/11/21 MLC	Examine Documents Review of certain governance provisions of Sackler Foundation Trust	.80	1,120.00
07/11/21 MLC	Examine Documents Review of comments sent to Debtors from the AHC on the MDT Agreement	1.10	1,540.00
07/12/21 JSF	Examine Documents Review of Issues re: Governance of Trusts	.40	358.00
07/12/21 JSF	Examine Documents Review of Plan and Plan Updates	.50	447.50
07/12/21 MLC	Correspondence Review of correspondence from Brown Rudnick tax lawyer Re: comments to revised plan	.90	1,260.00
07/12/21 MLC	Analysis of Memorandum Reviewed memorandum analyzing foundation board members in context of plan definitions	.90	1,260.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/12/21 MLC	Analysis of Memorandum Continued review of 6th Amended Plan	2.10	2,940.00
07/12/21 MLC	Correspondence Correspondence with non-consenting State concerning Guam	.60	840.00
07/12/21 MLC	Examine Documents Review of WVA AG Morrissey opposition to Purdue plan and Sackler settlement	.40	560.00
07/12/21 MLC	Correspondence Correspondence with working group re scheduling of confirmation hearing and related issues	.40	560.00
07/12/21 MLC	Examine Documents Review of changes to updated drafts of the MDT Agreement and Master TDP	1.70	2,380.00
07/12/21 MLC	Correspondence Correspondence re scheduling of call with newly supporting states	.30	420.00
07/12/21 MLC	Correspondence Correspondence re State disclaimer issue and its impact on the non-states	.30	420.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/13/21 JSF	Examine Documents Review of Sackler Agreement Terms re: Revised Payment Schedule and Remedies in Response to State Creditor Inquiry	1.40	1,253.00
07/13/21 JSF	Examine Documents Review of Plan Provisions in Response to State Creditor Inquiry	1.80	1,611.00
07/13/21 JSF	Correspondence Respond to State Creditor Inquiry re: Plan Provisions and Sackler Settlement	1.10	984.50
07/13/21 JSF	Examine Documents Review of Sixth Amended Plan Changes	.50	447.50
07/13/21 MLC	Conference call(s) Conference call with AHC counsel and state subgroup re negotiations involving DOJ and other parties	.60	840.00
07/13/21 MLC	Examine Documents Review of reports of rebuttal experts submitted by ad hoc group of hospitals	.80	1,120.00
07/13/21 MLC	Correspondence Review of draft correspondence with Eric Snyder re Alabama questions	.40	560.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/13/21 MLC	Correspondence Correspondence with AHC re extension of creditors' deadline to vote	.40	560.00
07/15/21 JSF	Examine Documents Review of Issues re: States' Consolidated Proof of Claim and Sackler Allegations	.60	537.00
07/15/21 MLC	Conference call(s) Conference call with AHC counsel and plan mediation subgroup	.80	1,120.00
07/15/21 MLC	Examine Documents Review of modifications to MDT and related documents	2.30	3,220.00
07/15/21 MLC	Examine Documents Review of NAS trust agreement attached to Plan amendments	.50	700.00
07/15/21 MLC	Analysis of Memorandum Review of motion by Sacklers challenging States POC	1.40	1,960.00
07/15/21 MLC	Correspondence Correspondence with Andrew Troop re Sackler motion	.30	420.00
07/15/21 MLC	Correspondence Correspondence among AHC counsel re Sackler motion and response thereto	.50	700.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/16/21 JSF	Telephone Call(s) Call with Professionals and States' Subcommittee to Review Certain Plan and Case Issues	.40	358.00
07/16/21 JSF	Telephone Call(s) Call with Gilbert Firm re: Confirmation Findings on Insurance Issues	.50	447.50
07/16/21 JSF	Examine Documents Review of Potential Insurance Related Findings re: Confirmation	.30	268.50
07/16/21 JSF	Examine Documents Review of Issues Raised re: States' Consolidated Claim and Plan Issues	1.20	1,074.00
07/16/21 MLC	Conference call(s) Conference call with Richard Shore and his team re certain insurance litigation issues and plan confirmation	.80	1,120.00
07/16/21 MLC	Analysis of Memorandum Review of litigation memorandum prepared by Gilbert re certain insurance confirmation issues	.90	1,260.00
07/16/21 MLC	Correspondence Follow up correspondence with AHC counsel re potential responses to Sackler motion	.80	1,120.00



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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/16/21 MLC	Correspondence Correspondence back and forth with John Guard re potential settlement with non-consenting states	.80	1,120.00
07/16/21 MLC	Correspondence Correspondence among counsel re withdrawal of motion by Sackler family against States' POC	.80	1,120.00
07/16/21 MLC	Correspondence Correspondence among AHC re budget for post confirmation Purdue disclosure program	.30	420.00
07/18/21 MLC	Correspondence Correspondence among AHC counsel re conference calls with DOJ re various issues	.80	1,120.00
07/19/21 JSF	Examine Documents Review of Certain Objections to Plan Filed by States and DOJ	1.70	1,521.50
07/19/21 MLC	Conference call(s) Conference call with plan mediation subgroup re certain objections to be filed today	.70	980.00
07/19/21 MLC	Analysis of Memorandum Review of statement filed by DOJ re: Plan	.90	1,260.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/19/21 MLC	Analysis of Memorandum Review of objection filed by State of CT	1.40	1,960.00
07/19/21 MLC	Analysis of Memorandum Review of joint objection filed by Oregon and Washington, joined in by California	1.30	1,820.00
07/19/21 MLC	Analysis of Memorandum Review of summary of various objections prepared by KL	1.30	1,820.00
07/20/21 JSF	Examine Documents Review of Summary of Filed Confirmation Objections	1.60	1,432.00
07/20/21 MLC	Conference call(s) Conference call with AHC counsel and States' Plan subgroup re review of objections to plan	.70	980.00
07/20/21 MLC	Correspondence Correspondence with DPW and UCC counsel re plan objections and next steps	.40	560.00
07/21/21 JSF	Examine Documents Review Draft of Final Mediator's Report	.40	358.00
07/21/21 JSF	Examine Documents Analysis and Update of Open Confirmation Issues and Status	1.20	1,074.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/21/21 MLC	Conference call(s) Conference call with counsel for debtors, UCC and AHC re preparation for confirmation hearing	1.00	1,400.00
07/21/21 MLC	Analysis of Memorandum Review and analysis of KL summary of objections to Plan	1.10	1,540.00
07/21/21 MLC	Analysis of Memorandum Review of draft of final mediator report re allocation of fees	.80	1,120.00
07/22/21 JSF	Examine Documents Review of Objections to Plan	2.30	2,058.50
07/22/21 MLC	Correspondence Correspondence with DPW, UCC counsel and AHC counsel re: confirmation hearing process, including timing, briefing and witnesses	.60	840.00
07/22/21 MLC	Review/analyze Reviewed and analyzed opposition to confirmation of plan filed by CT	1.30	1,820.00
07/23/21 JSF	Examine Documents Review of Filed Objections to Plan	2.20	1,969.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/23/21 JSF	Examine Documents Review of Outline of Responses to Objections to Confirmation	1.70	1,521.50
07/23/21 MLC	Examine Documents Review of debtors' initial list of potential witnesses at confirmation hearing	.40	560.00
07/23/21 MLC	Correspondence Correspondence with Eric Snyder (Alabama) re certain questions re non-state allocations	.40	560.00
07/23/21 MLC	Examine Documents Review of case update provided by KL re co-defendant objection	.60	840.00
07/23/21 MLC	Examine Documents Review of KL summary of objections filed by various non-consenting states	.60	840.00
07/26/21 JSF	Examine Documents Review of Witness and Exhibit List for Confirmation Hearing	.30	268.50
07/26/21 JSF	Examine Documents Attention to Confirmation Related Issues	2.30	2,058.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/26/21 MLC	Analysis of Memorandum Review and analysis of amended Settlement Agreement with the Sacklers as filed on July 19	1.40	1,960.00
07/27/21 JSF	Examine Documents Review of NOAT and NOAT TDP re: Response to State's Inquiry on Allocation Procedures from NOAT	1.10	984.50
07/27/21 JSF	Correspondence Respond to Counsel for Alabama re: NOAT Distribution Requirements	.30	268.50
07/27/21 JSF	Telephone Call(s) Participate in Call with State Reps and Co-Counsel re: Status of Open Issues and Confirmation Planning	.90	805.50
07/27/21 JSF	Examine Documents Review of Updates on Confirmation Hearing and Evidence/Witnesses	1.70	1,521.50
07/27/21 JSF	Examine Documents Review of Draft Confirmation Order	1.20	1,074.00
07/27/21 MLC	Conference call(s) Conference call with DPW, Akin and AHC counsel re responses to various confirmation objections	.70	980.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/27/21 MLC	Conference call(s) Conference call with States subgroup and AHC counsel re preparation of response to objections	.60	840.00
07/28/21 JSF	Examine Documents Review of Proposed Confirmation Hearing Schedule and Presentation of Evidence	.80	716.00
07/28/21 JSF	Examine Documents Review of Confirmation Order	1.20	1,074.00
07/29/21 JSF	Examine Documents Review of Confirmation Updates	1.00	895.00
07/29/21 JSF	Examine Documents Review and Analysis of Objection Issues re: Plan	1.40	1,253.00
07/29/21 JSF	Examine Documents Review of Draft Confirmation Order	.60	537.00
07/30/21 JSF	Telephone Call(s) Participate in Conference Call with Counsel for AHC, UCC and New Consenting States re: Sackler Negotiations	1.00	895.00
07/30/21 JSF	Examine Documents Review of Updates re: Confirmation and Confirmation Hearing and Documents in Support	1.70	1,521.50

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TOTAL PHASE PU11	105.60	\$127,741.00
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TOTAL FOR SERVICES		\$170,081.00
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**EXHIBIT D**

**Summary of Actual and Necessary Expenses**



**SUMMARY OF ACTUAL AND NECESSARY DISBURSEMENTS FOR THE  
STATEMENT PERIOD**

<b>Expense Category</b>	<b>Total Expenses</b>
Electronic Research	\$12.00
<b>TOTAL:</b>	<b>\$12.00</b>

**EXHIBIT E**

**Expense Detail**

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DISBURSEMENTS FOR YOUR ACCOUNT

Electronic Research	12.00
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TOTAL DISBURSEMENTS	<hr/> 12.00
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